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**U.S. House of Representatives**  
**Committee on Commerce**  
 Room 2125, Rayburn House Office Building  
 Washington, DC 20515-6115

December 3, 1997

US EPA RECORDS CENTER REGION 5



1004595

JAMES J. BORDENHAW, CHIEF OF STAFF

The Honorable Carol M. Browner  
 Administrator  
 Environmental Protection Agency  
 401 M Street, S.W.  
 Washington, D.C. 20460

Dear Administrator Browner:

We are transmitting a recently completed report (attached) by the General Accounting Office that raises serious concerns that companies are not cleaning up their facilities quickly enough and that properties remain contaminated, posing risks to public health and the environment. The Solid Waste Disposal Act, as amended by the Hazardous and Solid Waste Amendments of 1984, requires that facilities receiving a treatment, storage or disposal permit are legally obligated to address groundwater contamination and other releases from all units, active or inactive (Section 3004(u) or (v) and Conference Report No. 98-1133, October 3, 1984). But, according to the GAO, approximately one-third of the high-priority facilities (427) have not begun any cleanup activities. These facilities have apparently not even begun to investigate the contamination at their facilities and the EPA or the authorized state has not taken any action to require the cleanup of any releases of hazardous waste. Further, only 5% of the 1,304 high-priority facilities have completed cleanup, according to the GAO report.

We note that 60 percent of the high-priority facilities are located in authorized states where the state agency is principally responsible for insuring the expeditious cleanup of these facilities. For example, according to Table III of the GAO report, the following four states have more than 40 percent of their high-priority facilities in the category of cleanups not started:

Michigan	55%
New York	47%
Illinois	42%
Ohio	41%

To assist us in better understanding the factors cited by the General Accounting Office for the limited progress at these high-priority facilities, we request the following information be provided by January 15, 1998:

1. The GAO cited as a key factor the finding that "unless EPA or the states direct the companies to begin cleanup, the companies appear to perform cleanups only when they have business incentives to do so, such as an interest in selling or redeveloping the property."
  - (a) Please identify the 427 high-priority facilities where cleanup has not started and indicate whether a compliance schedule exists in the permit, the dates for action contained in the compliance schedule, if any, and whether or not an enforcement order has been issued at the facility.
  - (b) For the 197 high-priority facilities that are currently "investigating contamination," please indicate the date that the investigation will be completed according to a compliance schedule or enforcement order.
2. A second key factor cited by GAO finds that "cleanup has been hampered because EPA, as well as the states in the regions we reviewed, lack the resources they need to direct more companies to begin their cleanups and to provide timely oversight at the facilities already performing cleanups under the program."
  - (a) Please provide the amount of federal funding, if any, provided to each authorized state in FY 1997 to implement and carry out the RCRA corrective action program. Are specific funding amounts delineated for enforcement activities?
  - (b) According to GAO, Region III projected that the region would have enough resources to direct companies to begin cleanups at 4 of the 69 high-priority facilities awaiting cleanup. Similarly, Region V, with 82 high-priority facilities that have not taken any action, projected that corrective action enforcement will be undertaken at only three of the facilities during FY 1997 and anticipated that the states will undertake only a limited number of new cleanup actions.

Please indicate the number of new cleanups that each Region could direct for each FY 1997 and FY 1998 with the resources that have or will be made available to each Region. What are the corrective action program resources provided to each Region, both FTE's and dollar funding amounts, for FY 1998?

The Honorable Carol M. Browner  
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- (c) Please identify the funding amounts in dollars that have been provided to each of the authorized states for FY 1997 and FY 1998.
3. Groundwater contamination from releases of hazardous constituents from solid waste management units at facilities receiving permits was one of the principal concerns of the Congress in enacting the corrective action provisions of the Solid Waste Disposal Act.
- (a) For each of the 427 facilities where cleanup has not started, please indicate by state the location of the facility, the nature of contaminants that have been found to be in the ground water, the levels of contaminants in the groundwater, and the impact or potential impact, if any, on drinking water supplies or other beneficial uses. Please further indicate the nature and extent of testing or other investigation which has occurred to identify possible ground water contamination.
- (b) For each of the 197 high-priority facilities that are "investigating : contamination," please provide the location by state, the nature of the groundwater contamination, if any, the levels of contaminants, if known, and the impact or potential impact on drinking water supplies or other beneficial uses.
- (c) For each of the 297 high-priority facilities that are "controlling contamination," please provide information showing whether groundwater contamination is present at the facility, whether or not the control measures involve groundwater, the nature and type of any groundwater contamination, the impact or potential impact, if any, on drinking water supplies or other beneficial uses, and the nature of the control actions.
4. Another factor cited by GAO is the process which EPA and some states use for cleanups, including multiple reporting and review requirements. GAO further indicates that EPA has begun to streamline the cleanup process by publishing an advance notice of proposed rulemaking that incorporates some of the states, EPA regions, and industry's actions to promote more flexible cleanup approaches.

Since this program has suffered from the lack of any final implementing regulations for thirteen years, when does the agency plan on issuing final regulations for the corrective action program?

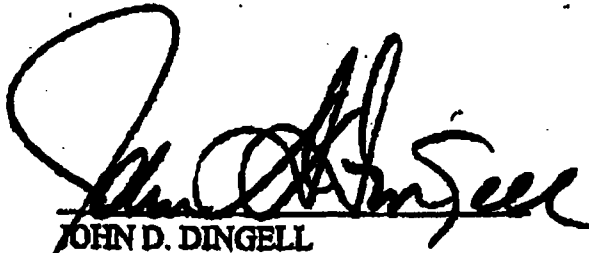
5. Please indicate the factors which were considered by EPA and the basis for identifying the 1,304 facilities as high-priority facilities. Is there a likelihood that

The Honorable Carol M. Browner  
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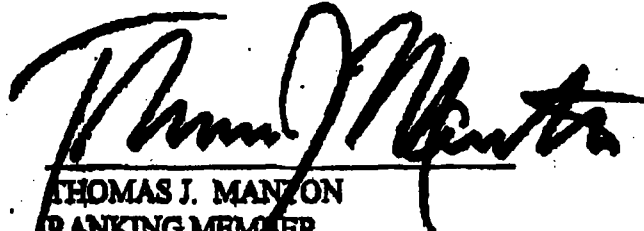
any of the medium-priority or low-priority facilities have contaminated or are likely to contaminate the groundwater? If so, please provide any information available on any such medium- or low-priority facility.

Thank you for your cooperation with this request.

Sincerely,



JOHN D. DINGELL  
RANKING MEMBER  
COMMITTEE ON COMMERCE



THOMAS J. MANTON  
RANKING MEMBER  
SUBCOMMITTEE ON FINANCE AND  
HAZARDOUS MATERIALS

cc: The Honorable Tom Bliley, Chairman  
Committee on Commerce

The Honorable Michael Oxley, Chairman  
Subcommittee on Finance and Hazardous Materials

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the program to follow the guidance will not ensure that they consistently use it to address the factors we identified as impeding cleanups.

## Recommendations

Whether the agency decides to use program guidance or final regulations as its vehicle for reforming the program, it will have to make additional efforts to ensure that the reforms are reflected in cleanups nationwide. Therefore, we recommend that the Administrator of EPA (1) devise a strategy with milestones for ensuring that cleanup managers in EPA's regions and the states authorized to implement the program have a consistent understanding of the new approaches provided by the guidance or regulations as well as how to apply these approaches to cleanup decisions and (2) oversee program implementation to determine if cleanup managers are appropriately using the new approaches as they direct cleanups.

## Agency Comments

We provided a draft of this report to EPA for its review and comment. We met with agency officials, including the Acting Deputy Director, Office of Solid Waste, the division with management responsibility for the Corrective Action Program. EPA generally agreed with the report's findings and suggested some technical revisions to the report, including some qualifications to the EPA data in our analyses, which we incorporated. The agency also identified seven issues it believed needed further clarification. First, EPA noted that, while the body of the report accurately acknowledges that facilities are taking cleanup actions outside of the Corrective Action Program that are not captured in EPA's database, the conclusions section does not. We agreed with the agency's assessment and added this point to that section. The agency also acknowledged that it needs to devise a process to capture data from the states on these other cleanup activities in order to fully assess the accomplishments of the Corrective Action Program. Second, the agency believes that one of the major factors affecting the rate of progress in the program is that the cleanups of many of the high-priority facilities are very complex and it therefore takes time to assess and clean up. We have noted this factor in the report where appropriate. Third, EPA made two points about our discussions of state voluntary cleanup programs: (1) the agency believes that a significant number of actions take place at RCRA facilities under state programs, such as state Superfund or water programs, as well as under state voluntary programs, and (2) the agency does not want to imply that it thinks high-priority sites should categorically be excluded from cleanups.

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conducted under state voluntary programs. We made these clarifications in the report.

Fourth, EPA noted that we should add or clarify information regarding the following three agency initiatives designed to help address some of the cleanup problems identified: (1) EPA's policy on RCRA/Superfund coordination, intended to prevent the duplication of, and promote better coordination on, cleanup efforts by the states and EPA regions; (2) EPA's post-closure rule, which the agency now plans to submit to the Office of Management and Budget for final review, intended to more effectively integrate corrective action and closure activities; and (3) EPA's new guidance on the use of certain enforcement orders as a more flexible tool for implementing cleanups. We made additions or clarifications in the report on the first two initiatives, but we did not address the third initiative because EPA has not yet issued the guidance.

Fifth, EPA disagreed with one company's claim that it spent a substantial portion of \$28 million in cleanup costs to comply with EPA's procedural requirements. EPA believes that this company's claim significantly overestimates the costs related to RCRA's procedural requirements; however, the agency does not have detailed cost data on this cleanup. Regional cleanup managers believe that the estimate includes work that the company performed at the facility that was in addition to work that EPA would require for RCRA cleanups. In response, we added EPA's view on this estimate to the report and more clearly attributed the figure to company representatives.

Sixth, EPA clarified the point that, in its view, it has conducted strategic planning efforts for the Corrective Action Program as part of the agency's RCRA Implementation Study, overall strategic plans for the Office of Solid Waste, RCRA implementation plans, and annual operating plans through the budget allocation process. We changed the report to reflect this information.

Finally, in commenting on the report's conclusions and recommendations, EPA stated that the conclusions lead a reader to expect that we would recommend that EPA issue final regulations for the program; however, we did not do so. The purpose of this report is to highlight barriers to cleanup progress, and we did not design our review to take a position on the agency's proposed regulations. We did, however, identify that one of the barriers to cleanup is regulators' inconsistent implementation of the program, in part because some regulators have used the proposed rules

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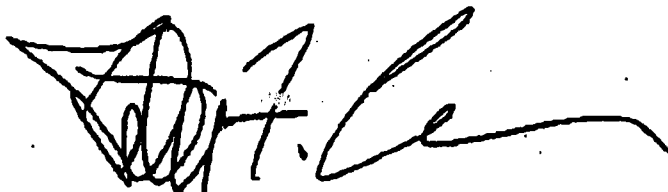
more flexibly as guidance, while others have used them more stringently. We believe that EPA needs to address this issue of how consistently regulators adopt new cleanup approaches. EPA can choose to do this either by issuing guidance or by promulgating final regulations. However, we believe that EPA must also go beyond either of these actions and take the steps necessary to ensure that the guidance or regulations are being implemented properly.

We conducted our review in accordance with generally accepted government auditing standards from December 1996 through September 1997.

As arranged with your office, unless you announce its contents earlier, we plan no further distribution of this report until 30 days after the date of this letter. At that time, we will send copies to the appropriate congressional committees; the Administrator, EPA; and other interested parties. We will also make copies available to others upon request.

Should you or your staff need further information, please call me at (202) 512-6111. Major contributors to this report are listed in appendix V.

Sincerely yours,



Peter F. Guerrero  
Director, Environmental  
Protection Issues

*Re Dingell Request*

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U.S. EPA REPORT OF:  
FACILITIES IN GAO REPORT AND DINGELL REQUEST  
FACILITIES CONTROLLING, INVESTIGATING, AND WITHOUT RFI'S IMPOSED

REGION	CATEGORY	STATE	EPA ID	HANDLER NAME	CITY
05	3	IL	ILD020367561	KERR MCGEE CHEMICAL CORP	MADISON
			ILD087157251	ENVIRONMENTAL WASTE RESOURCES INC	COAL CITY
			ILD980503106	AMOCO OIL CO RIVERFRONT	WOOD RIVER
			ILD980700967	AMOCO OIL CO WOOD RIVER REFINERY	WOOD RIVER
IN			IND000780544	FOUR COUNTY LDFL	ROCHESTER
			IND000807107	REILLY INDUSTRIES INC	INDIANAPOLIS
			IND006418263	BRIDGESTONE/FIRESTONE IND PROD DIV	NOBLESVILLE
			IND047030226	USS LEAD REFINERY INC	EAST CHICAGO
			IND984867481	HAYNES INTERNATIONAL INC	KOKOMO
MI			MID006014906	OCCIDENTAL CHEMICAL CORP	MONTAGUE
			MID020087128	REICHOLD CHEMICALS INC	FERNDALE
			MID080358351	AGREVO USA CO	MUSKEGON
			MID082767591	QUANEX CORP MICHIGAN SEAMLESS	SOUTH LYON
			MID099124299	JOHNSON CONTROLS INC	FOWLerville
OH			OHD000821348	TELEDYNE MONARCH RUBBER PLANTS 2 AND 5	HARTVILLE
			OHD004163549	ASSOCIATED MATERIALS INC ALSIDE DIV	CUYAHOGA FALLS
			OHD004198917	PPG INDUSTRIES INC	BARBERTON
			OHD004209094	UNION CAMP CORP	DOVER
			OHD004254132	CHEVRON USA PRODUCTS CO CINCINNATI FACIL	HOOVEN
			OHD004461711	STARK CERAMICS	EAST CANTON
			OHD004528873	AMERICAN METALS CORPORATION	WESTLAKE
			OHD005051826	BP OIL LIMA REFINERY	LIMA
			OHD042157644	BP CHEMICALS INC	LIMA
			OHD045205424	EKCO HOUSEWARES CO MASSILLON DIV	MASSILLON
			OHD046202602	AZTEC PEROXIDE INC	ELYRIA

*Buller*  
*M. Cooper*

*H. Valentini*



*Category 3*  
*Category 4*  
*Do Tables 2 & 3*

OHD068901610 TELEDYNE MONARCH RUBBER PLANT I HARTVILLE  
 OHD086438538 EM SCIENCE CINCINNATI  
 OHD980587364 SAFETY KLEEN CORP HEBRON  
 OHD980793384 RESERVE ENVIRONMENTAL SERVICES ASHTABULA  
 OHD980995963 ONARP INC LIMA  
 OHD990747859 OCCIDENTAL CHEMICAL CORP KENTON  
 WI WID023350192 MILWAUKEE SOLVENTS AND CHEMICALS CORP MENOMONEE FALLS

4 IL ILD000819946 BEAZER EAST INC CARBONDALE *W. Francis*  
 ILD005109525 GILBERT & BENNETT MFG CO BLUE ISLAND  
 ILD005172325 MODERN PLATING CORP FREEPORT  
 ILD005456439 SHERWIN WILLIAMS KENSINGTON DSC CHICAGO *W. Francis*  
 ILD041518861 TEXACO REFINING AND MARKETING INC LOCKPORT  
 ILD041544081 UNIVERSITY OF ILLINOIS CHAMPAIGN URBANA URBANA  
 ILD048296180 QUANTUM CHEMICAL/USI DIVISION MORRIS  
 ILD062480850 PHIBRO TECH INC JOLIET  
 ILD080012305 SHELL WOOD RIVER REFINERY CO ROXANA  
 ILD980700538 ASHLAND CHEMICAL CO WILLOW SPRINGS  
 IN IND000646950 METALWORKING LUBRICANTS INDIANAPOLIS  
 IND005081542 ESSROC MATERIALS LOGANSPOET  
 IND005444104 FEDERATED METALS CORP WHITING WHITING  
 IND006366819 ALCOA WARRICK NEWBURGH

**CATEGORIES:**

3 - CONTROLLING CONTAMINATION 4 - INVESTIGATING CONTAMINATION 5 - CLEANUP NOT STARTED  
 1 PAGE 15

U.S. EPA REPORT OF:  
 FACILITIES IN GAO REPORT AND DINGELL REQUEST  
 FACILITIES CONTROLLING, INVESTIGATING, AND WITHOUT RFI'S IMPOSED

REGION	CATEGORY	STATE	EPA ID	HANDLER NAME	CITY
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05 4 IN IND006376362 GENERAL ELECTRIC CO MOUNT VERNON  
 IND016621476 ASHLAND CHEMICAL CO DIV OF ASHLAND INC SOUTH BEND  
 IND074375585 AMOCO OIL CO WHITING REFINERY WHITING  
 IND082293143 INDIANA WOODTREATING CORP BLOOMINGTON  
 IND980503825 DELPHI ENERGY & ENGINE MGMT SYSTEMS ANDERSON  
 MI MID000820381 UPJOHN CO THE KALAMAZOO  
 MID005057005 FORD MOTOR CO MONROE PLT MONROE  
 MID006017966 LAMINA INC LAMINA BRONZE PROD DIV BELLAIRE  
 MID041793340 GMC POWERTRAIN SAGINAW METAL CASTINGS OP SAGINAW  
 MID064197742 BASF CORP WYANDOTTE  
 MID080359433 LACKS INDUSTRIES INC SARANAC  
 MN MND006162820 ASHLAND OIL INC ST PAUL PARK  
 MND006449649 CYPRUS NORTHSORE MINING SILVER BAY  
 OH OHD000810242 RMI TITANIUM CO SODIUM PLT ASHTABULA  
 OHD000817577 GMC HARRISON DIV MORaine PLANT MORaine  
 OHD004212999 BRUSH WELLMAN INC ELMORE  
 OHD004287322 DU PONT E I DE NEMOURS AND CO CIRCLEVILLE  
 OHD004341509 CYTEC INDUSTRIES INC MARIETTA  
 OHD004343117 SHELL CHEMICAL CO BELPRE  
 OHD020273819 CHEMICAL WASTE MANAGEMENT VICKERY  
 OHD041081548 WEAR EVER CHILLICOTHE  
 OHD043736644 THOMSON CONSUMER ELECTRONICS INC CIRCLEVILLE  
 OHD045243706 ENVIROSAFE SERVICES OTTER CREEK RD OREGON  
 OHD048415665 ROSS INCINERATION SERVICES INC GRAFTON  
 OHD055522429 REPUBLIC ENVIRONMENTAL SYSTEMS BEDFORD  
 WI WID000808824 HYDRITE CHEMICAL CO COTTAGE GROVE  
 WID006073225 KOHLER CO KOHLER  
 WID006091425 JOHNSON S C AND SON INC STURTEVANT  
 WID006125215 ANSUL INC STANTON ST MARINETTE  
 WID006144737 CURWOOD INC NEW LONDON  
 WID006179493 KOPPERS INDUSTRIES INC SUPERIOR  
 WID046536231 VULCAN MATERIALS CO PORT EDWARDS  
 WID059972935 PPG INDUSTRIES INC OAK CREEK  
 WID980615439 COOK COMPOSITES AND POLYMERS CO SAUKVILLE

*M. Caputo*

*M. Caputo*  
*D. J. Lenoir*  
*M. Caputo*

*B. Buller*

Table 1, Response to Question 1(a)<sup>1</sup> from Dingell Request

Site Name	EPA ID#	EPA or State Lead	Schedule of compliance (SOC) exists in a permit or EPA 3008(h) order (circle appropriate answer) <sup>2</sup>	Anticipated or Actual Date <sup>3</sup> RCRA Facility Investigation or equivalent imposed	Enforcement response <sup>4</sup> to lack of compliance with HSWA Corrective Action requirements (yes/no)
BASF, Inc.	MID 064197742	EPA	1. Yes, SOC in permit 2. Yes, SOC in 3008(h) order 3. Yes, SOC in State issued order 4. Yes, SOC contained in voluntary or other agreement 5. No, SOC does not exist in permit or order	RFI Rec'd. 12/4/97  RFI Imposed (see RFI) 2/14/94	No
			1. Yes, SOC in permit 2. Yes, SOC in 3008(h) order 3. Yes, SOC in State issued order 4. Yes, SOC contained in voluntary or other agreement 5. No, SOC does not exist in permit or order		
			1. Yes, SOC in permit 2. Yes, SOC in 3008(h) order 3. Yes, SOC in State issued order 4. Yes, SOC contained in voluntary or other agreement 5. No, SOC does not exist in permit or order		

<sup>1</sup> GAO category 5 facilities where cleanup has not yet started (i.e., RFI not yet imposed)

<sup>2</sup> HQ anticipates that most if not all facilities in this category will be "no, a SOC does not exist" since it is our understanding that facilities in this category do not have permits or orders initiating corrective action.

<sup>3</sup> If a schedule of compliance exists, indicate the actual date in which RFI has imposed (i.e., when a permit or an order was issued with RFI requirements). If a schedule of compliance does not exist (which HQ believes will be for the majority of these facilities), indicate the anticipated date in which an RFI will be imposed.

<sup>4</sup> Enforcement response could include orders, notices of violations, etc. HQ anticipates that the majority of facilities which do not have a schedule of compliance would have a corrective action related enforcement response.

5  
Do Not Need Table 1  
for BASF Category 4

Table 2, Response to Question 1(b)1 from Dingell Request

CA 200

Site Name	EPA ID#	EPA or State Lead	RFI completion date specified in the permit or order schedule of compliance <sup>2</sup>	Anticipated or Actual Date RCRA Facility Investigation will be completed <sup>3</sup>
BASF, Inc.	MID0064197742	EPA	June 30, 1998	June 30, 1998

Paul / Gerry's      Re: MID 980 825633      MID 006 000895

Please note that I did not complete Tables for MDNR Roscommon and KHI. I left a note with Bill Buller to explain why. MDNR Roscommon has an EPA Administrative Order that requires them to submit a closure/post closure plan.  
(CAFO)

The post closure plan was to address <sup>remedial/</sup>corrective action. The closure/post Closure plan was never approved by EPA Permits/DEQ and the Facility remains out-of-compliance and remedial action has never been initiated. Ground-water Monitoring is ongoing.

② KHI is the subject of an EPA Judicial Order requiring closure. As part of closure, DEQ has allowed the Facility to do some "RFI" type work. DEQ concluded this spring that clean-closure is not an option and corrective action/order is necessary. Whether this will be done by revising the Judicial Order or under a new State or EPA § 302(h) Order has not been decided. Paul was in discussion with State. I am not aware of the results of this discussion.

Table 3, Response to Question 3(a-c) from Dingell Request

Site Name	EPA ID#	EPA or State Lead	GAO <sup>1</sup> Category (3,4,5)	Primary ground water contaminant(s)/approx. max concentration (ppb)	Impact to ground water drinking supplies <sup>3</sup> (circle approp. answer)	Investigations initiated <sup>4</sup> (yes/no)	Control action for ground water initiated <sup>5</sup> (yes/no)	Type of ground water control, if a control has been initiated (circle all that apply)
BASF, Inc	MID 064 197742	EPA	4	1. / ppb 2. / ppb 3. / ppb	① Potential impact 2. No potential impact 3. Actual impact	Yes	Yes	① Pump and treat 2. Physical Barrier (e.g, slurry wall) 3. NAPL recovery 4. Bioremediation 5. Other
				1. / ppb 2. / ppb 3. / ppb	1. Potential impact 2. No potential impact 3. Actual impact			1. Pump and treat 2. Physical Barrier (e.g, slurry wall) 3. NAPL recovery 4. Bioremediation 5. Other
				1. / ppb 2. / ppb 3. / ppb	1. Potential impact 2. No potential impact 3. Actual impact			1. Pump and treat 2. Physical Barrier (e.g, slurry wall) 3. NAPL recovery 4. Bioremediation 5. Other

- 1 "GAO Category" refers to three categories into which GAO categorizes facilities according to their RCRIS codes. HQ will be complete this column as well as the site name, EPA ID #, and State initial columns prior to sending out the final table.
- 2 Respondents should identify at a minimum the primary contaminant(s) associated with ground water; however, additional contaminant names can also be identified. Please provide in parts per billion (ppb).
- 3 "Potential impact" should be circled if the facility has actual or potential contaminated ground water and the ground water is identified at or near (within 1 mile radius of facility boundary) the facility as a potential source of drinking water. "No potential impact" should be circled if either the facility does not have actual or potential ground water contamination or if the facility has ground water contamination and the ground water at or near the facility is not identified as actual or potential source of drinking water. "Actual Impact" should be circled if the facility has actual contaminated ground water and the ground water at or near the facility is currently being used as source of drinking water.
- 4 "Investigations Initiated" refers to whether some kind of site characterization activities, beyond an RCRA Facility Assessment, have occurred at the facility to aid in identifying actual or potential ground water contamination.
- 5 "Control action for ground water" refers to whether a remedial action has been initiated at the site in response to contaminated ground water.

TABLE 7-46

**Constituents of Concern for Groundwater  
BASF - Wyandotte RFI**

Constituent	Groundwater Concentration (1)
<b>Volatle Organics (ug/L)</b>	
Benzene	2,834.70
Chlorobenzene	67.78
Vinyl chloride	224.84
<b>Semi-Volatile Organics (ug/L)</b>	
Acenaphthene	8.01
Benzo(a)anthracene	10.92
Benzo(a)pyrene	7.39
Benzo(b)fluoranthene	8.80
bis(2-Chloroethyl) ether	106.60
bis(2-Chloroisopropyl) ether	39.00
Chrysene	8.06
2-Methylnaphthalene	101.73
4-Methylphenol	154.30
Naphthalene	61.83
o-Toluidine	236.42
Phenanthrene	7.77
Pyridine	232.51
<b>Metals/Inorganics (mg/L)</b>	
Arsenic	0.585
Barium	1.620
Cadmium	0.0052
Copper	0.370
Lead	0.209
Mercury	0.006
Nickel	0.266
Selenium	0.023
Total Cyanide	42.866
Vanadium	1.099
Zinc	0.540

(1) Highest value of the following:

- highest 80% UCL value from the set of perimeter wells, or
- highest analytical result for any individual non-network monitoring well.